

Dry Cask Storage

Overview of Operating Experience Sharing

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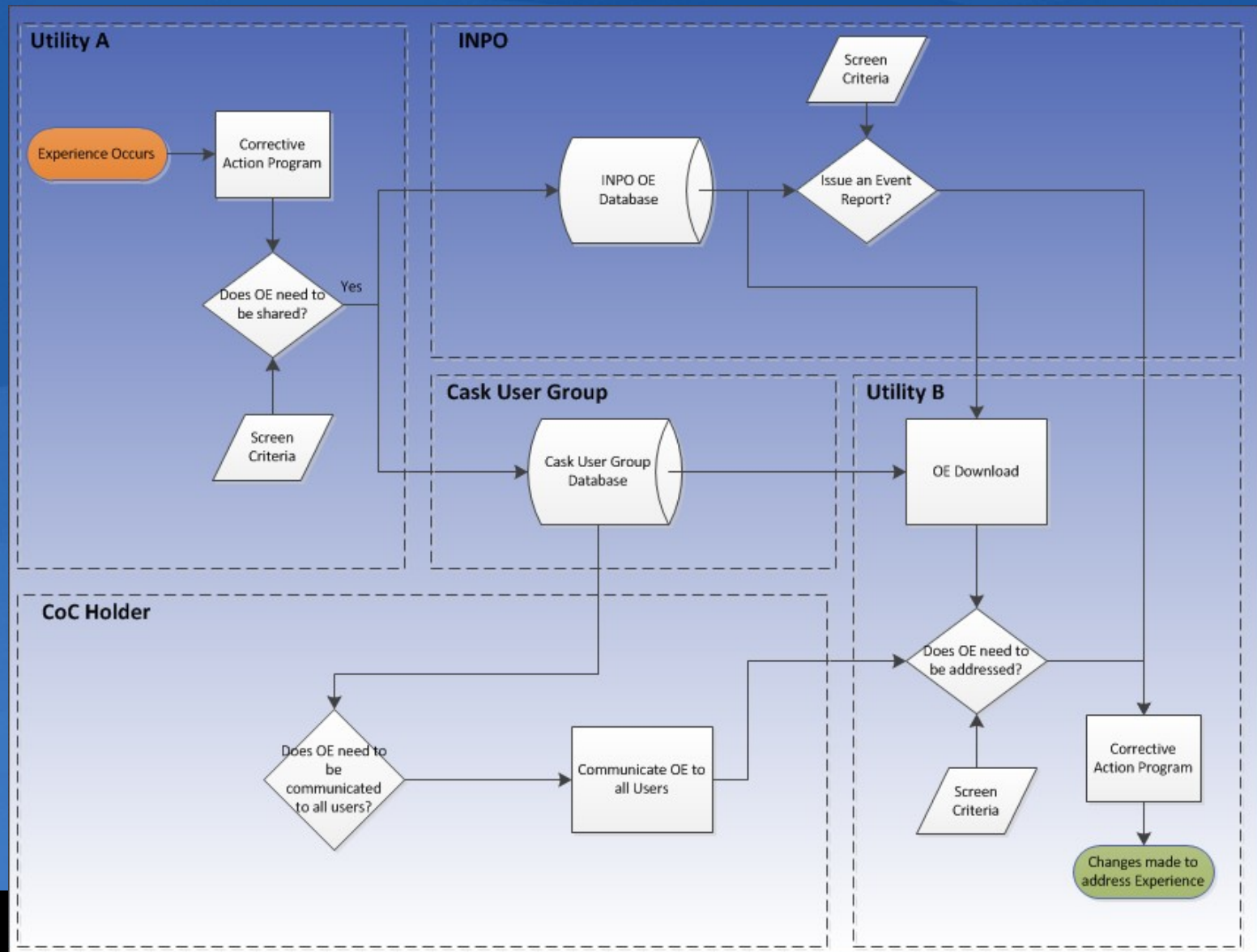


Operating experience is different from regulatory experience

	Type of event	Regulatory Reporting	Communication Vehicle
Regulatory Experience	Safety significant and non-compliant with regulations	10CFR21, 72.74, 72.75,	Bulletin, Generic Letter, Information Notice
Operating Experience	Something interesting, or possibly a near safety or compliance event	None required	Sharing of OE through INPO and/or User Group programs, and possibly an INPO Event Report

- OE can be 1) improved method, or 2) problem encountered
- OE is typically related to field activities (e.g. loading, drying), but can also be related to administrative type activities (e.g. procedure)

OE sharing process (example)



OE Sharing through INPO

- **INPO Guidelines on OE sharing**
 - Same for reactors, fuel, cask
 - Relevant to safety (industrial and nuclear)
 - Does not address fabrication issues (business sensitive)
 - Unless these impact plant schedule
- **OE Database**
 - Criteria for OE input in INPO guidelines
- **INPO Event Report**
 - Plant events (e.g. dropped fuel assembly)
 - Multiple levels of reporting, depending on significance
 - Summary of event
 - Recommendations
 - Request for actions

OE Sharing through User Groups

- Each User Group has its own OE sharing program
- OE Database
 - No threshold criteria for OE input
- Types of OE
 - Mostly operational (e.g. loading, drying operations, etc)
 - Typically no design or fabrication OE (business sensitive)

Potential improvements that industry is considering

- **Improved consistency**
 - Standardization of screening criteria
 - Collecting “best practices” of OE sharing
- **Increase extent of sharing**
 - All licensee and CoC Holder access to INPO database
 - Sharing between User Groups
 - Sharing between CoC holders and Users Groups
- **Areas that are challenging**
 - Design and fabrication OE (business sensitive)
 - Navigating business and contractual hurdles of “OE ownership”